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*Attorneys for Victim*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANASTASSIA KREZOUN,

Defendant.

Case No. 8:23-CR-00042-CJC

**VICTIM'S UNOPPOSED *EX PARTE*  
APPLICATION FOR ORDER  
SEALING (1) VICTIM'S MOTION  
FOR AMENDED SENTENCING  
MEMORANDUM THAT PROTECTS  
HIS PRIVACY AND DIGNITY  
PURSUANT TO CRIME VICTIMS'  
RIGHTS ACT, 18 U.S.C. § 3771; (2)  
SUPPORTING EXHIBIT AND (3)  
PROPOSED ORDER**

[[Proposed] Order Filed Concurrently  
Herewith]

1           **PLEASE TAKE NOTICE** that the Victim, by and through his counsel of  
 2 record, hereby applies *ex parte* for an order that the following documents be filed  
 3 under seal: (1) Victim’s Motion for Amended Sentencing Memorandum That Protects  
 4 His Privacy and Dignity Pursuant to Crime Victim’s Rights Act, 18 U.S.C. § 3771; (2)  
 5 attached exhibit to the Motion; and (3) Proposed Order on the Motion, (collectively,  
 6 the “Motion”).

7           The Motion should be sealed because it references identifying and other  
 8 personal sensitive person information of the Victim. Protection of the Victim’s  
 9 dignity and privacy – including by sealing the Motion, is required by the Crime  
 10 Victims’ Rights Act, which affords to crime victims the right, among other things, “to  
 11 be treated with fairness and with respect for the victim’s dignity and privacy.” 18  
 12 U.S.C. § 3771(a)(8). Accordingly, Victim requests that these documents be filed  
 13 under seal in accordance with the CVRA, to protect his dignity and privacy.

14           Victim’s counsel conferred by phone with AUSA Andrew Roach on May 21,  
 15 2024 and by email with Defendant’s counsel, Deputy Federal Public Defender Terra  
 16 D. Castillo Laughton, on May 21, 2024, regarding the filing of the Victim’s Motion  
 17 under seal. Mr. Roach stated that the government does not object to this sealing  
 18 Application or to the filing of Victim’s Motion under seal. Ms. Laughton stated that  
 19 she takes no position on whether the Victim’s Motion should be filed under seal.

20           Should the Court deny this Application, Victim requests that the Motion and  
 21 this Application not be filed, but be returned to Victim, without filing of the  
 22 documents on the clerk’s public docket.

23 Dated: May 22, 2024

Respectfully submitted,

SIDLEY AUSTIN LLP

By: /s/ Douglas A. Axel

Douglas A. Axel  
 Anna Tutundjian

*Attorneys for Victim*

**DECLARATION OF DOUGLAS A. AXEL**

I, Douglas A. Axel, declare and state:

1. I am a partner at the law firm of Sidley Austin LLP, and represent the Victim in the present matter. I have personal knowledge of the matters set forth in this declaration, and if called to testify thereto, I could and would do so competently.

2. For reasons described in the Victim's sealing Application, the Victim requests that the following documents be filed under seal: (1) Victim's Motion for Amended Sentencing Memorandum That Protects His Privacy and Dignity Pursuant to Crime Victim's Rights Act, 18 U.S.C. § 3771; (2) attached exhibit to the Motion; and (3) Proposed Order on the Motion, (collectively, the "Motion").

3. I conferred by phone with AUSA Andrew Roach on May 21, 2024 and by email with Defendant's counsel, Deputy Federal Public Defender Terra D. Castillo Laughton, on May 21, 2024, regarding the filing of the Motion under seal. Mr. Roach stated that the government does not object to this sealing Application or to the filing of Victim's Motion under seal. Ms. Laughton stated that she takes no position on whether the Victim's Motion should be filed under seal.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration is executed this 22nd day of May 2024, in Los Angeles, California.

By: /s/ Douglas A. Axel  
Douglas A. Axel